

**EXHIBIT A**

The deponent(s) shall designate witnesses to give evidence on its behalf as provided by Rule 30(b)(6) as follows:

The custodian(s) or person(s) best able to produce, identify, explain the following documents and give evidence and discovery about the following matters:

1. The truth, *vel non*, of the allegations of Baptist Health's First Amended Complaint on file herein;
2. Communications (whether oral or written) by and between The Health Law Firm and Plaintiff Baptist Health regarding risk management issues;
3. Documents related to Baptist Health's Economic Credentialing Policy at issue in the subject litigation;
4. All Health Law Firm action taken and advice given with respect to risk management issues for Plaintiff, Baptist Health;
5. The scope of practice, practice areas, and other legal experience of all Health Law Firm attorneys who have provided services to Plaintiff Baptist Health from the beginning of such relationship to present;
6. All Health Law Firm attorneys and staff working for and/or providing information and resources to Plaintiff, Baptist Health;
7. All Health Law Firm attorneys, staff, or members communicating with other attorneys and/or their staff with respect to the following litigations: *Murphy, et al. v. Baptist Health*, No. 4:04-CV-11(E.D. Ark.), Pulaski County Case No. CV-2004-2002; *Cathey v. Baptist Health*, Pulaski County Case No. CV-2005-5701; *Little Rock Cardiology Clinic, P.A. v. Baptist Health, et al.*, Case No. 4:06-CV-1594-JLH; *Platte River Ins. Co. v. Baptist Health, et al.*, Case No. 4:07-CV-36-SWW (W.D. Ark.);
8. All seminars put on by The Health Law Firm covering directors and officers insurance;
9. All seminars put on by The Health Law Firm covering risk management issues;
10. All publications, articles, or books authored or contributed by all Health Law Firm attorneys who have ever provided services to or worked for the Plaintiff Baptist Health